

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GRASSI, <i>et al.</i> ,)	Case No. 1:18-CV-2619-PAB
)	
)	Judge Pamela A. Barker
Plaintiffs,)	
)	
v.)	
)	
JOHN GRASSI, <i>et al.</i> ,)	
)	
Defendants.)	

PROPOSED JOINT STIPULATIONS OF FACT

Pursuant to the Court’s Civil Trial Order dated June 3, 2022 (ECF Doc. 137), plaintiffs Michael Grassi and CFOM, Inc., and defendants John Grassi and Alotech Limited LLC, submit this proposed joint stipulations of fact to the Court.

* * *

Proposed Joint Stipulations of Fact

1. John Grassi and Michael Grassi are twin brothers.
2. John Grassi is the sole owner and President of Alotech Limited, LLC.
3. Michael Grassi is the sole owner of CFOM, Inc
4. Charles Rizzuti is not, and has never been, an employee of Alotech.

November 28, 2022

Respectfully submitted,

/s/ Jeffrey Saks

Michael B. Pasternak (Ohio Bar No. 0059816)

E-mail: Mpasternak1@msn.com

THE LAW OFFICE OF MICHAEL PASTERNAK

3681 South Green Road, Suite 411

Beachwood, Ohio 44122

Telephone: (216) 360-8500

Jeffrey Saks (Ohio Bar No. 0071571)

E-mail: jsaks@sakslawoffice.com

THE SAKS LAW OFFICE, LLC

3681 South Green Road, Suite 411

Beachwood, Ohio 44122

Telephone: (216) 255-9696

*Counsel for Plaintiffs Michael Grassi
and CFOM, Inc.*

-and-

/s/ Suzanne Bretz Blum

Suzanne Bretz Blum (0047231)

Brouse McDowell

600 Superior Avenue East, Suite 1600

Cleveland, Ohio 44114

P: (216) 830-6830 / F: (216) 830-6807

sblum@brouse.com

/s/ John M. Moyer

John M. Moyer (GA Bar 685211)*

Barnes & Thornburg LLP

3475 Piedmont Road, Suite 1700

Atlanta, Georgia 30305

P: (404) 264-4006 / F: (404) 264-4003

jmoyer@btlaw.com

/s/ Cole Ramey

Cole Ramey (TX Bar No. 16494980)*

Kilpatrick Townsend & Stockton, LLP

2001 Ross Avenue, Suite 4400

Dallas, Texas 75201

P: (214) 922-7100 / F: (214) 922-7101

cramey@kilpatricktownsend.com

/s/ Steven Moore

Steven Moore (CA Bar No. 290875)*
Kilpatrick Townsend & Stockton, LLP
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
P: (415) 273-4741 / F: (415) 651-8510
smoore@kilpatricktownsend.com

* Admitted *Pro Hac Vice*

Counsel for Defendants